

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TILLIE SALTZMAN, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

CITIGROUP INC., CHARLES O. PRINCE,  
ROBERT E. RUBIN, STEPHEN R. VOLK,  
SALLIE L. KRAWCHECK, GARY L.  
CRITTENDEN and ROBERT DRUSKIN,

Defendants.

CIVIL ACTION NO. 07-9901-SHS

LENNARD HAMMERSCHLAG,  
Individually, and On Behalf of All Others  
Similarly Situated,

Plaintiff,

vs.

CITIGROUP INC., CHARLES PRINCE,  
SALLIE KRAWCHECK, GARY  
CRITTENDEN,

Defendants.

CIVIL ACTION NO. 07-10258-RJS

DECLARATION OF THE HONORABLE MARC DANN AND  
WILLIAM J. NEVILLE IN SUPPORT OF THE U.S. PUBLIC FUND  
GROUP'S MOTION FOR APPOINTMENT AS LEAD PLAINTIFF



1. I, Marc Dann, am the Attorney General of the State of Ohio. As the Attorney General, I provide legal counsel to the public pension funds of the State of Ohio, including the State Teachers Retirement System of Ohio.

2. I, William J. Neville, am the General Counsel of the Ohio State Teachers Retirement System ("Ohio STRS" and, with the Attorney General of the State of Ohio, "Ohio"). As General Counsel, I serve as the principal in-house counsel to Ohio STRS.

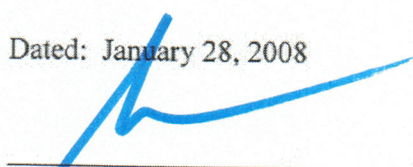
3. Ohio STRS and the Office of the Ohio Attorney General are presently represented by the law firm of Schiffrin Barroway Topaz & Kessler, LLP ("Schiffrin Barroway") in *Life Enrichment Foundation v. Merrill Lynch*, No. 07-CV-9633 (LBS) (S.D.N.Y.) ("*Merrill Lynch*"), in which Ohio STRS is seeking appointment as Lead Plaintiff.

4. Through its representation of Ohio STRS and the Office of the Attorney General in *Merrill Lynch*, Schiffrin Barroway has been privy to confidential information about Ohio's legal strategies, including confidential information concerning the Citigroup securities class action. Among other things, prior to January 7, 2008 Schiffrin Barroway was aware of Ohio STRS' intention to file a Lead Plaintiff motion in the *Citigroup* and was informed of Ohio STRS' financial interest in that action.

5. Prior to January 7, 2008, Schiffrin Barroway approached Ohio with a proposal to seek joint appointment as Lead Plaintiff with certain Swedish institutional investors with whom Schiffrin Barroway was in contact. Under this proposal, Schiffrin Barroway would serve as an additional Lead Counsel in the *Citigroup* action. Ohio rejected Schiffrin Barroway's proposal. The Swedish funds themselves never contacted Ohio STRS or the Office of the Attorney General. Schiffrin Barroway persisted in urging

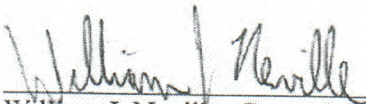
us to move jointly with the Swedish institutional investors. As late as the afternoon of Friday, January 4, 2008—the last business day before the statutory deadline for motions for appointment as Lead Plaintiff in the *Citigroup* action—Schiffrin Barroway continued to contact Ohio in an effort to persuade us to cause Ohio STRS to seek joint Lead Plaintiff status with Schiffrin Barroway's Swedish clients. Schiffrin Barroway did not indicate that it represented any other institutions that intended to move for appointment as Lead Plaintiff in *Citigroup*, or that the Swedish funds it represented had or intended to partner with any other foreign or domestic institutions.

Dated: January 28, 2008



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The Honorable Marc Dann  
Attorney General of the State of Ohio



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William J. Neville, General Counsel  
State Teachers Retirement System of Ohio